

1 **Thomas E. Clifford**
2 **Attorney at Law**
3 **2nd Floor, Alexander Building, San Jose**
4 **P.O. Box 506514**
5 **Saipan, MP 96950**
6 **Tel. (670)235-8846**
7 **Fax (670)235-8848**

8 **Attorney for Defendant Dongbu Insurance Company, Ltd.**

9 **IN THE UNITED STATES DISTRICT COURT**
10 **FOR THE**
11 **NORTHERN MARIANA ISLANDS**

12 **JUNG SOON LEE (deceased), by**
13 **SUNG YOUNG LEE, Personal**
14 **Representative**

15 **Plaintiff,**

16 **v.**

17 **DONG GUK CORPORATION,**
18 **and DONGBU INSURANCE**
19 **COMPANY, LTD.**

20 **Defendants.**

Civil Action No. 05-0031

REQUEST FOR ENTRY OF
JUDGMENT

(No hearing requested)

21 Pursuant to Federal Rule of Civil Procedure 58(d), Defendant Dongbu Insurance Co., Ltd.
22 (“Dongbu”) hereby respectfully requests that judgment be entered in this matter. Dongbu states as
23 follows in support of this request.

24 1. On April 19, 2007, the Court entered its *Order Granting Defendant Dongbu Insurance’s Motion for*
25 *Summary Judgment Against Defendant Dong Guk Corporation on the Issue of Insurance Coverage*
26 *Under the Insurance Policy* (the “summary judgment order”).

2. The summary judgment order established that there is no coverage under the insurance policy.

Hence, entry of judgment in favor of Dongbu and against Defendant Dong Guk Corporation (“DGC”)


1 is proper on Dongbu's cross-claim against DGC for a declaratory judgment on the issue of insurance
2 coverage.

3 3. Entry of judgment in favor of Dongbu and against Plaintiff on Plaintiff's "direct action claim" is
4 also therefore proper. (Please note the direct action claim was also made the subject of Dongbu's
5 motion, but it was not addressed expressly in the summary judgment order, presumably because it goes
6 without saying that the direct action claim is subject to the insurance policy being applicable).

7
8 4. On April 20, 2007, the Court entered its *Order Granting Defendant Dong Guk's Motion to Dismiss*
9 *with Prejudice and Denying Motion for Summary Judgment as Moot* (the "dismissal order").

10 5. The summary judgment order and the dismissal order have disposed of all parties and claims in this
11 case and therefore entry of judgment is now appropriate.

12 Respectfully submitted this 15th day of May, 2007:

13 
14 _____
15 Thomas E. Clifford
16 Counsel for Defendant/Cross Claimant
17 Dongbu Insurance Company, Ltd.
18
19
20
21
22
23
24
25
26